



Solutia Inc.
575 Maryville Centre Drive
St. Louis, Missouri 63141

P.O. Box 66760
St. Louis, Missouri 63166-6760
Tel: 314-674-1000

February 8, 2006

Mr. R. Bruce Stuart, P.E., R.G.
Chief, Groundwater Unit
Permits Section
Missouri Department of Natural Resources, HWP
7545 S. Lindbergh Blvd., Suite 210
St. Louis, MO 63125-4839

Re: Operation Maintenance & Inspection Report,
Solutia Inc. – John F. Queeny Plant
St. Louis, MO

461719



RCRA RECORDS

Dear Mr. Stuart:

This letter is in response to the MDNR Hazardous Waste Program's Operation Maintenance & Inspection report recently received by Solutia for its John F. Queeny plant's developing groundwater monitoring program. The report outlined MDNR's review of the adequacy of Solutia's groundwater monitoring well network, sampling procedures and data quality. It also advised that Solutia will be expected to develop and implement a groundwater monitoring program upon final remedy decisions that will be made as part of our ongoing RCRA Corrective Action program. We have been working with Ms. Christi Kump-Mitchell of your office in regard to this program and in developing our groundwater monitoring plan.

As Ms. Kump-Mitchell knows, Solutia is working closely with EPA Region 7 and the MDNR to complete risk assessment work for the program. We have made significant progress in developing our Corrective Measures Study (CMS) for the site but can't proceed until the risk assessment is approved. As directed by your office, a proposed groundwater Sampling and Analysis Plan (SAP) will be part of the final CMS. Upon implementation, Annual Groundwater Monitoring Reports will be submitted by March 1 of the following year.

The most significant finding of the MDNR's Comprehensive Groundwater Monitoring Evaluation (CME) was that repair and improvements were needed for several of the site's sixty-six monitoring wells. Solutia proposes that the best timing for addressing these wells will be when we reach agreement with the Agencies on our groundwater SAP. We will then know what existing wells will be part of our program and make the required repairs. Those wells that are not part of the program will be abandoned as part of overall site closure activities. This will be more efficient and will make the site more amenable to redevelopment.

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AMID/RCRA

Solutia appreciates MDNR's consideration of this proposal. If you require any additional information I can be reached at 314-674-6717 or at mlhous1@solutia.com

Sincerely,

A handwritten signature in black ink that reads "Michael House". The signature is fluid and cursive, with the first name "Michael" being more prominent than the last name "House".

Michael House
Manager, Remedial Projects
Solutia Inc.

Cc: Christine Kump-Mitchell, MDNR-STL
Stephanie Doolan, EPA Region VII
Vin Journey, MDNR
Robert Hiller, JF Queeny
Bob Billman, URS